

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Dec 14, 2022

SEAN F. MCAVOY, CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LOPEZ FERREL,

Defendant.

No. 4:22-CR-06011-MKD

PROTECTIVE ORDER AND ORDER
GRANTING MOTION TO
EXPEDITE

ECF Nos. 44, 45

Before the Court is the parties' Motion for Stipulated Protective Order, ECF No. 44, and related Motion to Expedite, ECF No. 45. The parties stipulate to the following conditions. The Court has reviewed the record and the motion and finds good cause to enter the requested Protective Order.

IT IS HEREBY ORDERED:

1. The parties' Motion for Stipulated Protective Order, **ECF No. 44**, is **GRANTED**. The parties' related Motion to Expedite, **ECF No. 45**, is **GRANTED**.

2. Except as described in this order, Defense Counsel shall not distribute,

PROTECTIVE ORDER AND ORDER GRANTING MOTION TO EXPEDITE -

1 show, or make available to individuals other than the Defendant, his Defense
2 attorneys, his staff, Defense investigators, experts or consultants specifically
3 retained by Defendant's counsel, the materials provided by the United States in
4 discovery, or copies or summaries thereof.

5 3. The Defense attorneys, staff, Defense investigators, experts or
6 consultants retained by Defendant's counsel shall not leave with the Defendant the
7 materials provided by the United States in discovery, or any copies or summaries
8 thereof.

9 4. Defense counsel shall not share or provide any discovery items
10 produced by the United States in this case with anyone other than designated
11 Defense counsel and his Defense investigators, retained expert witnesses, and
12 support staff. Defense counsel may permit the Defendant to view unredacted
13 discovery items in the presence of Defense counsel and his Defense investigators
14 and support staff except for video recording or other discovery which portrays the
15 CI in this case. Defense counsel personally, or through Defense counsel's
16 investigators and support may, may show unredacted discovery items to witnesses
17 in regard to items or events about which a witness may have personal knowledge
18 except for video recording or other discovery which portrays the CI in this case.
19 Defense counsel and his investigators and support staff shall not allow the
20 Defendant or witnesses to copy protected information contained in the discovery.

1 5. Defense counsel shall store the discovery in a secure place and will
2 use reasonable care to ensure that it is not disclosed to third persons contrary to this
3 protective order. If the assigned Defense attorney is relieved or substituted from
4 the case Defense counsel will return the discovery to the United States or certify
5 that it has been shredded.

6 6. Defense counsel shall be responsible for advising the
7 client/Defendant, employees, witnesses and other members of the Defense support
8 staff or experts regarding the contents of this protective order.

9 **IT IS SO ORDERED.** The Clerk's Office is directed to enter this Order
10 and provide copies to all counsel.

11 **DATED** December 14, 2022.

12 s/Mary K. Dimke
13 MARY K. DIMKE
14 UNITED STATES DISTRICT JUDGE